



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

100 CHURCH STREET  
NEW YORK, NY 10007

**James M. Sheehan**  
*Assistant Corporation Counsel*  
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February 13, 2023

**BY ECF**

Honorable Alvin K. Hellerstein  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Phillip Jacobs v. City of New York, et al.,  
22-CV-05723 (AKH)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I write pursuant to Rule 1.4 of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York to request that the Court issue an Order substituting the undersigned as counsel of record on behalf of defendants City of New York (“City”), New York City Police Department, and Alfred Maldonado in place of former Senior Counsel Erica Bianco. Simultaneously herewith, I am filing a notice of substitution of counsel and a Declaration of Erica Bianco in support of this motion.

Defendants thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ James M. Sheehan  
James M. Sheehan  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: **VIA ECF**  
Steven Goldman  
*Attorney for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PHILLIP JACOBS,

Plaintiff,

- against -

THE CITY OF NEW YORK; NEW YORK CITY POLICE  
DEPARTMENT; P.O. ALFRED MALDONADO, SHIELD #  
7409, 44 PRECINCT, POLICE OFFICERS JOHN DOE 1-10,  
SHIELD NUMBERS UNKNOWN,

Defendants.

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**NOTICE OF SUBSTITUTION  
OF COUNSEL**

22-CV-05723 (AKH)

**PLEASE TAKE NOTICE** that the following attorney is hereby substituted in place of Erica Bianco, as counsel of record on behalf of the Corporation Counsel of the City of New York, Honorable Sylvia O. Hinds-Radix, attorney for defendants City of New York (“City”), the New York City Police Department, and Alfred Maldonado.

James M. Sheehan  
*Assistant Corporation Counsel*  
New York City Law Department  
100 Church Street  
New York, New York 10007  
(212) 356-2105  
[jasheeha@law.nyc.gov](mailto:jasheeha@law.nyc.gov)

From this date forward, please serve all pleadings on the attorney set forth above, and please remove Erica Bianco as counsel of record.

Dated: New York, New York  
February 13, 2023

**HON. SYLVIA O. HINDS-RADIX**  
CORPORATION COUNSEL OF THE CITY OF NEW YORK  
*Attorney for Defendants City of New York, the New York City Police  
Department, and Alfred Maldonado*  
100 Church Street  
New York, New York 10007  
(212) 356-2386

/s/ James M. Sheehan  
James M. Sheehan  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc:

**VIA ECF**

Steven Goldman, Esq.  
*Attorney for Plaintiff*

**DECLARATION**

I, ERICA BIANCO, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an Assistant Corporation Counsel at the New York City Law Department and, on behalf of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, I am counsel of record in this action.

2. The representation of City Defendants in this matter has been transferred to another Assistant Corporation Counsel at the New York City Law Department, who is filing a Notice of Substitution of Counsel along with this declaration. My last day working for the New York City Law Department will be February 10, 2023. After that date, I will have no involvement in this matter whatsoever.

3. Please terminate me from the docket sheet as counsel of record and replace me with the attorney whose name and information appears on the attached Notice of Substitution of Counsel.

Dated: New York, New York

February 3, 2023

*Erica Bianco*

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ERICA BIANCO